

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

JUNE O'HEARN, Individually and  
Derivatively on Behalf of MEDIENT  
STUDIOS, INC.,

Plaintiff,

vs.

CHARLES KOPPELMAN, JOSEPH  
GIAMICHAEL, DAVID PATERSON,  
JOEL SHAPIRO a/k/a JAKE SHAPIRO,  
MANU KUMARAN and MEDIENT STUDIOS,  
INC. a/k/a MEDIENT STUDIOS INDIA  
PVT LTD,

Defendants.

**CV 414 - 186**

Civil Action No. \_\_\_\_\_

**NOTICE OF REMOVAL**

**TO: JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN  
DISTRICT OF GEORGIA, SAVANNAH DIVISION:**

COME NOW Defendants Charles Koppelman, Joseph Giamichael, David Paterson, Joel Shapiro a/k/a Jake Shapiro, and Medient Studios, Inc. a/k/a Medient Studios India Pvt Ltd. (hereinafter "Defendants") and file this Notice of Removal of the above-styled action from the Superior Court of Effingham County, Georgia, to the United States District Court for the Southern District of Georgia, Savannah Division. In support of this removal, Defendants show the following:

1. On June 27, 2014, a Complaint was filed in the Superior Court of Effingham County, Georgia, SU14CV074T, styled *June O'Hearn, Individually and Derivatively on Behalf of Medient Studios, Inc. v. Charles Koppelman, Joseph Giamichael, David Paterson, Joel Shapiro a/k/a Jake Shapiro, Manu Kumaran and Medient Studios, Inc. a/k/a Medient Studios India Pvt Ltd*, and the Clerk of

said Court issued a Summons, a copy of which Complaint and Summons, together with all other documents filed in connection therewith, are attached.

2. Defendant Joel Shapiro a/k/a Jake Shapiro first received a copy of the Complaint and Summons on July 16, 2014, when Defendant Shapiro was served with a copy of the Complaint and Summons.
3. Defendant David Paterson first received a copy of the Complaint and Summons on July 18, 2014, when Defendant David Paterson was served with the Complaint and Summons.
4. Defendant Medient Studios, Inc. first received a copy of the Complaint and Summons on July 28, 2014, when Defendant Medient Studios, Inc. was served with the Complaint and Summons.
5. Defendant Joseph Giamichael first received a copy of the Complaint and Summons, in or around August 20, 2014.
6. It is the understanding of undersigned counsel that Defendant Manu Kumaran has not been properly served within the meaning of 28 U.S.C. § 1446(b)(2)(A).
7. Defendant Charles Koppelman first received a copy of the Complaint and Summons on July 30, 2014, when Defendant Charles Koppelman was served with the Complaint and Summons.
8. This Notice is filed within thirty (30) days from the date the last-served Defendant received a copy of the Complaint and Summons.
9. The Plaintiff, in her Complaint, made a claim against the Defendants for violations of "Section 14(a) of the Exchange Act," or 15 U.S.C. § 78n(a), over which this Court has original and exclusive jurisdiction under 15 U.S.C. §

78aa(a). 15 U.S.C. § 78aa(a) provides in part that the “district courts of the United States ... shall have exclusive jurisdiction of violations of this chapter [the Securities Exchange Act of 1934] or the rules and regulations thereunder, and of all suits in equity and actions at law brought to enforce any liability or duty created by this chapter or the rules and regulations thereunder.” Accordingly, this action is properly removable and removed to this Court pursuant to the provisions of 28 U.S.C. §§1441.

10. 28 U.S.C. § 1441 authorizes removal of any civil action brought in a state court in which the United States District Court for that District has original jurisdiction.
11. True and correct copies of this Notice of Removal are being filed with the Clerk of the Superior Court of Effingham County, Georgia as required by 28 U.S.C. § 1446(d).
12. Written notice of the filing of this Notice is being given to all parties in this case as required by 28 U.S.C. § 1446(d). Copies of all pleadings, orders and other documents filed in the Superior Court of Effingham County, Georgia in the above-styled case to date are attached hereto as Exhibit A, including particularly the Complaint and Summons previously described together with the documents attached thereto.

WHEREFORE, Defendants give notice that the above-described superior court action has been removed to this Honorable Court.

This 26<sup>th</sup> day of August, 2014.

HUNTER, MACLEAN, EXLEY & DUNN, P.C.

/s/ John M. Tatum

John M. Tatum

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Rachel Young Fields

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**LIST OF EXHIBITS**

**EXHIBIT A:**

- A-1 Summons and Complaint, and Attorney's Certificate 3.2
- A-2 Notice of Filing for Joel and Jake Shapiro, David Paterson and Medient Studios, Inc.
- A-3 Notice of Filing for Charles Koppelman
- A-4 Civil Case Disposition Form
- A-5 Copy of Notice of Removal, filed in Superior Court of Effingham County, Georgia